

Antonio Valiente

From: Splitt, Steven <ssplitt@iadc.org>
Sent: Tuesday, July 15, 2025 12:02 PM
To: Antonio Valiente
Cc: Boroughf, Benjamin; Gleason, Richard
Subject: RE: Rule 11 Sanctions Motion (Draft) - 21 Day Notice (Children of the Court v. IADC) 25-cv-03387-AMP-GAF

Sensitivity: Confidential

Mr. Valiente,
We don't believe there is any reason to confer.
We have no objection to your proposed briefing schedule.

Steve Splitt, Ben Boroughf & Richard Gleason

From: Antonio Valiente <lcdoavaliente@live.com>
Sent: Monday, July 14, 2025 12:14 PM
To: Splitt, Steven <ssplitt@iadc.org>; Gleason, Richard <RGleason@iadc.org>; Boroughf, Benjamin <BBoroughf@iadc.org>
Subject: RE: Rule 11 Sanctions Motion (Draft) - 21 Day Notice (Children of the Court v. IADC) 25-cv-03387-AMP-GAF
Sensitivity: Confidential

Messrs. Splitt, Gleason & Boroughf:

Hope these lines find you well.

Do you wish to confer tomorrow Tuesday about the 12(d) relief, assuming your answer on the Rule 11 sufficed. In the alternative, we suggest a 7 -day briefing schedule. May we have 2 days to reply?

Please advise.

Antonio Valiente

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From: Splitt, Steven <ssplitt@iadc.org>
Sent: Wednesday, July 9, 2025 2:47 PM
To: Antonio Valiente <lcdoavaliente@live.com>; Gleason, Richard <RGleason@iadc.org>; Boroughf, Benjamin <BBoroughf@iadc.org>
Subject: RE: Rule 11 Sanctions Motion (Draft) - 21 Day Notice (Children of the Court v. IADC) 25-cv-03387-AMP-GAF
Sensitivity: Confidential

Mr. Valiente,

After careful consideration, we decline to strike any language from the memorandum in support of our motion to dismiss.

Steve Splitt, Ben Boroughf & Richard Gleason

From: Antonio Valiente <lcdoavaliente@live.com>

Sent: Friday, June 20, 2025 1:52 PM

To: Splitt, Steven <ssplitt@iadc.org>; Gleason, Richard <RGleason@iadc.org>; Boroughf, Benjamin <BBoroughf@iadc.org>

Subject: Rule 11 Sanctions Motion (Draft) - 21 Day Notice (Children of the Court v. IADC) 25-cv-03387-AMP-GAF

Sensitivity: Confidential

Mr. Splitt:

Please find attached a motion we intend to file end of day Friday, July 11th, offering 21 days' notice pursuant to Rule 11.

If you agree to strike the language related to the disciplinary complaint in the 12(b)(6) portion of your Motion, we will not file for sanctions.

Cordially,

Antonio Valiente

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